The Sanchez Center Privacy Policy

Last Updated: November 14, 2022

The Sanchez Center PLLC ("**The Practice**," "**us**," "**we**," or "**our**"), provides psychotherapist/mental health services and immigration evaluations. This Privacy Policy is designed to help you understand how we collect, use, process, and share your personal information and to help you understand and exercise your privacy rights.

- 1. SCOPE
- 2. PERSONAL INFORMATION WE COLLECT
- 3. HOW WE USE YOUR INFORMATION
- 4. HOW WE DISCLOSE YOUR INFORMATION
- 5. YOUR PRIVACY CHOICES AND RIGHTS
- 6. SECURITY OF YOUR INFORMATION
- 7. INTERNATIONAL DATA TRANSFERS
- 8. RETENTION OF PERSONAL INFORMATION
- 9. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS
- 10. CHILDREN'S INFORMATION
- 11. OTHER PROVISIONS
- 12. CONTACT US

1. SCOPE

This Privacy Policy applies to personal information processed by us, including on our websites and other online or offline offerings. To make this Privacy Policy easier to read, our websites and other offerings are collectively called "Services."

This Privacy Policy describes how we protect your privacy as a general user of the website, not as a patient receiving therapy services from The Practice. If you are a patient receiving therapy services from The Practice, you have other rights with respect to the access, use, and disclosure of health information that is subject to the Health Insurance Portability and Accountability Act ("HIPAA"). For a more complete description of a patient's rights under HIPAA, please refer to the Notice of Privacy Practices that The Practice provides to you as part of your onboarding process and through the link on our website. You may also email us at info@sanchezcenter.com to request a copy of our Notice of Private Practices.

2. PERSONAL INFORMATION WE COLLECT

The categories of personal information we collect depend on how you interact with us, our Services, and the requirements of applicable law. For example, we may collect different information depending on whether you are a patient/client, healthcare professional, or visitor to our website. We collect information that you provide to us, information we obtain automatically when you use our Services, and information from other sources such as third-party services and organizations, as described below.

A. Information You Provide to Us Directly

We may collect the following personal information that you provide to us.

• **Account Creation**. We may collect information when you create an account, such as name, email address, phone number, and username.

- **Healthcare Professionals.** If you are a healthcare professional, we may collect certain information such as your professional contact information, credential and institutional affiliations information, information about our programs and activities in which you have participated, our interactions with you, published papers, your photograph, and/or and information in any agreements executed with us.
- **Immigration Evaluation Referrers.** If you are a referrer to The Practice for immigration evaluations, we may collect information such as your name, email address, and phone number.
- **Purchases**. We may collect personal information and details associated with your purchases, including payment information. Any payments made via our Services are processed by third-party payment processors. We do not directly collect or store any payment card information entered through our Services, but we may receive information associated with your payment card information (e.g., your billing details).
- Your Communications with Us. We may collect personal information, such as email address, phone number, or mailing address when you request information about our Services, register for our newsletter, request customer or technical support, apply for a job, or otherwise communicate with us.
- **Surveys**. We may contact you to participate in surveys. If you decide to participate, you may be asked to provide certain information, which may include personal information.
- Conferences, Trade Shows, and Other Events. We may collect personal information from individuals when we attend or host conferences, trade shows, and other events.
- **Business Development and Strategic Partnerships**. We may collect personal information from individuals and third parties to assess and pursue potential business opportunities.
- **Job Applications**. We may post job openings and opportunities on our Services. If you reply to one of these postings by submitting your application, CV and/or cover letter to us, we will collect and use this information to assess your qualifications.

B. Information Collected Automatically

We may collect personal information automatically when you use our Services:

- Automatic Data Collection. We may collect certain information automatically when you use our Services, such as your Internet protocol (IP) address, user settings, MAC address, cookie identifiers, mobile carrier, and other unique identifiers, browser or device information, location information (including approximate location derived from IP address), and Internet service provider. We may also automatically collect information regarding your use of our Services, such as pages that you visit before, during and after using our Services, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Services.
- Cookies, Pixel Tags/Web Beacons, and Other Technologies. We, as well as third parties that
 provide content, or other functionality on our Services, may use cookies, pixel tags, and other
 technologies ("Technologies") to automatically collect information through your use of our
 Services.

- Cookies. Cookies are small text files placed in device browsers that store preferences and facilitate and enhance your experience.
- Pixel Tags/Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded in our Services that collects information about engagement on our Services. The use of a pixel tag allows us to record, for example, that a user has visited a particular web page or clicked on a particular website feature. We may also include web beacons in e-mails to understand whether messages have been opened, acted on, or forwarded.

Our uses of these Technologies fall into the following general categories:

- Operationally Necessary. This includes Technologies that allow you access to our Services, applications, and tools that are required to identify irregular website behavior, prevent fraudulent activity, improve security, or allow you to make use of our functionality;
- **Performance-Related**. We may use Technologies to assess the performance of our Services, including as part of our analytic practices to help us understand how individuals use our Services (*see Analytics below*);
- Functionality-Related. We may use Technologies that allow us to offer you enhanced functionality when accessing or using our Services. This may include identifying you when you sign into our Services or keeping track of your specified preferences, interests, or past items viewed;
- **Targeting-Related**. We may use first party or third-party Technologies to deliver content on our Services or on third-party websites.

See "Your Privacy Choices and Rights" below to understand your choices regarding these Technologies.

- Analytics. We may use Technologies and other third-party tools to process analytics information
 on our Services. These technologies allow us to process usage data to better understand how our
 website and web-related Services are used, and to continually improve and personalize our
 Services. Some of our analytics partners include:
 - Google Analytics. For more information about how Google uses your data (including for its own purposes, e.g. for profiling or linking it to other data), please visit <u>Google Analytics'</u>
 <u>Privacy Policy</u>. To learn more about how to opt-out of Google Analytics' use of your information, please click here.
 - **LinkedIn Analytics**. For more information, please visit <u>LinkedIn Analytics' Privacy Policy</u>. To learn more about how to opt-out of LinkedIn's use of your information, please click here.
 - Mixpanel. For more information about Mixpanel, please visit Mixpanel's Privacy Policy.

C. Information Collected from Other Sources

Third-Party Services. We may obtain information about you from other sources, including through third-party services and organizations. For example, if you are a healthcare professional, we may collect information such as hospital affiliation, license information, areas of interest, contact information such as address, email, and phone number, and other due diligence related information. For example, if you access our Services through a third-party application, such as an app store, a third-party login service, or a social networking site, we may collect information about you from that third-party application that you have made available via your privacy settings.

3. HOW WE USE YOUR INFORMATION

We use your information for a variety of business purposes, including to provide our Services, for administrative purposes, and to market our Services, as described below.

A. Provide Our Services

We use your information to fulfil our contract with you and provide you with our Services, such as:

- Managing your information and accounts;
- Providing access to certain areas, functionalities, and features of our Services;
- Answering requests for customer or technical support;
- Communicating with you about your account, activities on our Services, and policy changes;
- Processing your financial information and other payment methods for Services purchased;
- Processing applications if you apply for a job we post on our Services; and
- Allowing you to register for events.

B. Administrative Purposes

We use your information in our legitimate interest, such as:

- Pursuing our legitimate interests such as network and information security and fraud prevention;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity, and prosecuting those responsible for that activity;
- Measuring interest and engagement in our Services;
- Improving, upgrading, or enhancing our Services;
- Developing new Services;
- Ensuring internal quality control and safety;
- Authenticating and verifying individual identities, including requests to exercise your rights under this policy;
- Debugging to identify and repair errors with our Services;
- Auditing relating to interactions, transactions, and other compliance activities;
- Sharing information with third parties as needed to provide the Services;
- Enforcing our agreements and policies; and
- Other uses as required to comply with our legal obligations.

C. Marketing our Services

We may use personal information to tailor and provide you with content. We may provide you with these materials as permitted by applicable law.

Some of the ways we market to you include email campaigns. If you have any questions about our marketing practices or if you would like to opt out of the use of your personal information for marketing purposes, you may contact us at any time as set forth in "Contact Us" below.

D. With your Consent

We may use personal information for other purposes that are clearly disclosed to you at the time you provide personal information or with your consent.

E. Other Purposes

We also use your information for other purposes as requested by you or as permitted by applicable law.

• **De-identified and Aggregated Information**. We may use personal information and other information about you to create de-identified and/or aggregated information, such as de-identified demographic information, information about the device from which you access our Services, or other analyses we create. If we create or receive personal data that has been de-identified or aggregated, we will not attempt to reidentify it, except to comply with applicable law.

4. HOW WE DISCLOSE YOUR INFORMATION

We disclose your information to third parties for a variety of business purposes, including to provide our Services, to protect us or others, or in the event of a major business transaction such as a merger, sale, or asset transfer, as described below.

A. Disclosures to Provide our Services

The categories of third parties with whom we may share your information are described below.

- **Service Providers**. We may share your personal information with our third-party service providers who use that information to help us provide our Services. This includes service providers that provide us with IT support, hosting, payment processing, customer service, and related services.
- **Business Partners**. We may share your personal information with business partners to provide you with a service you have requested. We may also share your personal information with business partners with whom we jointly offer services.
- **Affiliates**. We may share your personal information with our affiliates.
- **APIs**. We may use third-party Application Program Interfaces ("**APIs**") as part of the functionality of our Services. For more information about our use of APIs, please contact us as set forth in "<u>Contact</u> Us" below.

B. Disclosures to Protect Us or Others

We may access, preserve, and disclose any information we store associated with you to external parties if we, in good faith, believe doing so is required or appropriate to: comply with law enforcement or national security requests and legal process, such as a court order or subpoena; protect your, our, or others' rights, property, or safety; enforce our policies or contracts; collect amounts owed to us; or assist with an investigation or prosecution of suspected or actual illegal activity.

C. Disclosure in the Event of Merger, Sale, or Other Asset Transfers

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, purchase or sale of assets, or transition of service to another provider, your information may be sold or transferred as part of such a transaction, as permitted by law and/or contract.

5. YOUR PRIVACY CHOICES AND RIGHTS

Your Privacy Choices. The privacy choices you may have about your personal information are determined by applicable law and are described below.

- Email and Telephone Communications. If you receive an unwanted email from us, you can use the unsubscribe link found at the bottom of the email to opt out of receiving future emails. Note that you will continue to receive transaction-related emails regarding Services you have requested. We may also send you certain non-promotional communications regarding us and our Services, and you will not be able to opt out of those communications (e.g., communications regarding our Services or updates to our Terms or this Privacy Policy).
- Text Messages. You may opt out of receiving text messages from us by contacting us.
- "Do Not Track." Do Not Track ("DNT") is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.

Your Privacy Rights. In accordance with applicable law, you may have the right to:

- Access Personal Information about you, including: (i) confirming whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information in a structured, commonly used, and machine readable format; and (iii) receiving an electronic copy of personal information that you have provided to us, or asking us to send that information to another company in a structured, commonly used, and machine readable format (the "right of data portability");
- **Request Correction** of your personal information where it is inaccurate or incomplete. In some cases, we may provide self-service tools that enable you to update your personal information;
- Request Deletion of your personal information;
- Request Restriction of or Object to our processing of your personal information; and
- Withdraw your Consent to our processing of your personal information. Please note that your
 withdrawal will only take effect for future processing, and will not affect the lawfulness of
 processing before the withdrawal.

If you would like to exercise any of these rights, please contact us as set forth in "Contact Us" below. We will process such requests in accordance with applicable laws.

6. SECURITY OF YOUR INFORMATION

We take steps to ensure that your information is treated securely and in accordance with this Privacy Policy. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized disclosure.

By using our Services or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

7. INTERNATIONAL DATA TRANSFERS

All information processed by us may be transferred, processed, and stored anywhere in the world, including, but not limited to, the United States or other countries, which may have data protection laws that are different from the laws where you live. We endeavor to safeguard your information consistent with the requirements of applicable laws.

8. RETENTION OF PERSONAL INFORMATION

We store the personal information we collect as described in this Privacy Policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

9. SUPPLEMENTAL NOTICE FOR NEVADA RESIDENTS

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Information to third parties who intend to license or sell that Personal Information. You can exercise this right by contacting us at info@sanchezenter.com with the subject line "Nevada Do Not Sell Request" and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Information as sales are defined in Nevada Revised Statutes Chapter 603A. If you have any questions, please contact us as set forth below.

10. CHILDREN'S INFORMATION

The Services are not directed to children under 13 (or other age as required by local law)[, and we do not knowingly collect personal information from children].

11. OTHER PROVISIONS

Third-Party Websites/Applications. The Services may contain links to other websites/applications and other websites/applications may reference or link to our Services. These third-party services are not controlled by us. We encourage our users to read the privacy policies of each website and application with which they interact. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

Supervisory Authority. If you are located in the European Economic Area, Switzerland, the United Kingdom, or Brazil, you have the right to lodge a complaint with a supervisory authority if you believe our processing of your personal information violates applicable law.

Changes to our Privacy Policy. We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy if you continue to use our Services after the new Privacy Policy takes effect.

12. CONTACT US

If you have any questions about our privacy practices or this Privacy Policy, or to exercise your rights as detailed in this Privacy Policy, please contact us at:

Sanchez Center PLLC Attn: Marisol Sanchez

1629 K St NW, Suite 300 Washington, DC 20006

(202) 335-4870

info@sanchezcenter.com